

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION

IN RE:

Turnkey Products, LLC

Debtor.

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CASE NO. 15-  
Chapter 11

MOTION FOR EXPEDITED HEARING

NOW COMES Turnkey Products, LLC by and through counsel, and pursuant to Bankruptcy Rule 9006 requesting an expedited hearing and that certain notices be shortened and, in support thereof, shows unto the Court the following:

1. On April 17, 2015, the Debtor filed for relief under Chapter 11 of the United States Bankruptcy Code. Since that time, the Debtors have been operating as debtors-in-possession.

2. On April 17, 2015, the Debtor filed the following pleading:

EMERGENCY MOTION TO INCUR DEBT WITH CONTINUING  
WITH THE CURRENT FACTORING AGREEMENT AND  
INVENTORY LINE OF CREDIT AND FOR AUTHORITY TO USE  
CASH COLLATERAL

EMERGENCY MOTION TO PAY EMPLOYEES SALES  
COMMISSIONS IN THE ORDINARY COURSE OF BUSINESS

3. If the Debtor is not authorized to incur debt for Post-Petition Financing and pay employees sales commissions in the ordinary course of business the Debtor will suffer irreparable harm as it will not be able to continue operations. Additionally, the Debtor will suffer further irreparable harm as it may not be able to retain its current Salespeople, or preserve its business affairs.

4. For reasons stated herein, the Debtor is requesting that the time for the hearing on the Motion be shortened pursuant to Bankruptcy Rule 9006 to allow for a hearing on an expedited

basis. The Court has authority to shorten the notice requirement for cause pursuant to Bankruptcy Rule 9006(c).

WHEREFORE, the Debtor respectfully request that the Court shorten the notice period and grant an expedited hearing on the Motion to Incur Debt Post-Petition Financing and Motion to Pay Employees Sales Commissions in the Ordinary Course of Business and allowing a hearing to be heard on an expedited basis.

RESPECTFULLY SUBMITTED, this the 17<sup>th</sup> day of April, 2015.

/s/Charles M. Ivey, III

Charles M. Ivey, III

NCSB # 8333

Attorney for Debtor-in-Possession

/s/ Samantha K. Brumbaugh

Samantha K. Brumbaugh

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Attorney for Debtor-In-Possession

**OF COUNSEL:**

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